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12 Otto Trucking LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,
Plaintiff,
v.
Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF SHANE BRUN IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

Courtroom: 8
Judge: Hon. William Alsup
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Defendants' Motion for Summary Judgment
2. Proposed Judgment
3. Chang Declaration
4. Schwarz Declaration

1 I, SHANE BRUN, declare:

2 1. I am a partner with the law firm Goodwin Procter LLP. I am a member in good
3 standing of the Bar of the State of California and the Bar of this Court. I make this declaration
4 based on personal knowledge and, if called as a witness, I could and would testify competently to
5 the matters set forth herein. I make this declaration in support of Defendants' Motion for
6 Summary Judgment.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of Otto Trucking's
8 Objections and Supplemental Responses to Waymo's Third Set of Expedited Interrogatories Nos.
9 24-25, dated July 7, 2017.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of Otto Trucking's
11 Objections and Responses to Waymo's Third Set of Expedited Interrogatories Nos. 21-28, dated
12 June 20, 2017.

13 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Expert
14 Report of Michael J. Wagner.

15 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Waymo's
16 Disclosure of Asserted Claims and Infringement Contentions.

17 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the Opening
18 Expert Report of Dr. Andrew Wolfe.

19 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of Waymo's
20 Supplemental Objections and Responses to Otto Trucking's Interrogatory Nos. 1-9, dated August
21 24, 2017.

22 8. Attached hereto as Exhibit 7 is a true and correct copy of the Opening Expert
23 Report of Lambertus Hesselink, Ph.D.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed this 31st day of August, 2017 in San Francisco, California.

27 _____
28 _____
/s/ *Shane Brun*
SHANE BRUN

1 **ATTESTATION OF E-FILED SIGNATURE**

2 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
3 Declaration. In compliance with General Order 45, X.B., I hereby attest that Shane Brun has
4 concurred in this filing.

5 Dated: August 31, 2017

/s/ Michael A. Jacobs

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MICHAEL A. JACOBS

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DECLARATION OF SHANE BRUN IN SUPPORT OF
DEFENDANTS' MSJ

CASE NO. 3:17-CV-00939-WHA